

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

_____)	
RELAXE FLSE LLC,)	
)	
Plaintiff,)	
)	Docket No. 1:22-cv-00327-LM
v.)	
)	
JBL VILLAGE SHOPPES LLC,)	
)	
Defendants.)	
_____)	

DEFENDANT'S
MOTION TO DISMISS

The defendant, JBL Village Shoppes LLC ("JBL"), through counsel, Devine, Millimet & Branch, P.A., submits the following Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(2), (3).

1. The plaintiff is a New Hampshire company, but this lease dispute otherwise has no connection with the forum.

2. JBL is a Florida company, the leased property is in Florida, and the dispute concerns local approvals for that Florida property.

3. Accordingly, the Court should dismiss the case for lack of personal jurisdiction.

4. For the same reasons, the Court should dismiss the case on improper venue grounds.

5. Alternatively, the case should be transferred to the U.S. District Court for the Southern District of Florida, where JBL is subject to personal jurisdiction.

6. In further support of its position, JBL relies upon and incorporates by reference its Memorandum of Law in Support of Motion to Dismiss, which is being filed in conjunction with this Motion.

7. Because this is a dispositive Motion, undersigned counsel did not seek concurrence in the relief sought.

WHEREFORE, JBL Village Shoppes LLC respectfully asks this Court to:

- A. Grant this Motion to Dismiss;
- B. Dismiss the case on personal jurisdiction or improper venue grounds; or, in the alternative;
- C. Transfer the case to the U.S. District Court for the Southern District of Florida; and
- D. Grant any other relief the Court deems just and equitable.

Respectfully submitted,

JBL Village Shoppes LLC

By its Attorneys,

DEVINE, MILLIMET & BRANCH, P.A.

Dated: October 14, 2022

By: /s/ Devin K. Bolger
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I, Devin K. Bolger, hereby certify that a copy of the foregoing was served on all counsel of record via this Court's electronic filing system.

Dated: October 14, 2022

/s/ Devin K. Bolger
Devin K. Bolger